BOBS-MSC-POL1

POLICY

MANAGEMENT OF IMPARTIALITY AND CONFIDENTIALITY

MANAGEMENT SYSTEMS CERTIFICATION SCHEME

0.0 DOCUMENT ATTRIBUTES AND APPROVAL

0.1 ABOUT THE DOCUMENT

Title	**MANAGEMENT OF IMPARTIALITY AND CONFIDENTIALITY**		
Classification	Policy	**Document No.**	BOBS.MSC.POL1
Supporting Documents Procedures and Forms	*BOBS.MSC.POL1.A01* – Impartiality and Confidentiality Statements *BOBS.MSC.POL1.F01 –* Risk Assessment Matrix *BOBS.MSC.POL1.F02* – Appointment Form- General *BOBS.MSC.POL1.F03* – Impartiality and confidentiality undertaking *BOBS.MSC.POL1.F04* – Appointment Form - Committees		
Distribution note	This policy distribution is limited to the strict confidential use by BOBS internally for its certification service and may on no account be reproduced, copied, or divulge to a third party without the prior authorization of BOBS Management.		

0.2 CHANGE HISTORY

Revision Statement	This document shall be reviewed after three years from the date of issuance and/or revised and re-issued after at least nine (9) revisions whichever comes first.	**Mandatory review date**	2027-08-26

Change ID	Effective date	Description of change	Type of Change	
			Minor	Major
1	2016-04-01	'shall' in the document deleted in the whole document	✓	
2	2020-02-10	previous '~~shall~~' removed from document	✓	
3	2023-12-01	Clause 5.1.4.4 replaced committee with committees	✓	
4	2023-12-01	Clause 5.1.4.4 replaced *BOBS.MSC.POL1. F03] with BOBS.MSC.POL1.F04 Appointment Form - Committees]*	✓	
5				
6				
7				
8				

0.3 APPROVAL

Designation	Name	Signature
Director – Commercial Enterprises	**Keeper Morgan**	

1.0 Purpose

BOBS is very conscious of the importance of being impartial and being perceived to be impartial as well as ensuring that all information accessed and/or obtained during its certification services is maintained in strict confidence. In rendering its management systems certification, BOBS' personnel are privileged to access its clients confidential information. To gain and maintain confidence, BOBS shall ensure that all possible conflicts of interest and duty in providing certification services are managed. BOBS shall have arrangements put in place to ensure the confidentiality of the information obtained or created during the certification activities.

This policy defines how impartiality and confidentiality is managed with regard to the management systems certification activities.

2.0 Scope

This Policy applies to all personnel of BOBS with privilege to access client's confidential information. The Policy also applies to BOBS' personnel involved in processes whereby decisions made could compromise impartiality.

3.0 Roles and Responsibilities

3.1 Director – Commercial Enterprises

- Ensure the effective implementation of this Policy at all certification committee meetings;
- Ensure review of the Policy for continued suitability.

3.2 Manager – Certification Services

- Ensure implementation of this Policy at Certification Unit level.

4.0 Terms, Definitions, Abbreviations and Acronyms

For purposes of this Policy, the terms, definitions, abbreviations and acronyms in *[BOBS.MSC.PROC1.A01 Terms, Abbreviations and Acronyms]* shall apply.

5.0 Policy Principles

5.1 Management of Impartiality

5.1.1 Threats to Impartiality

5.1.1.1 BOBS' management is committed in ensuring that the management systems certification services are rendered in such a manner that its actions are impartial.

5.1.1.2 BOBS' management understands the importance of impartiality in carrying out its management systems certification and thus manages all identified possible conflict of interests to ensure the objectivity of the certification activities.

5.1.1.3 BOBS developed and maintains publicly accessible Impartiality and Confidentiality Statements, *[BOBS.MSC.POL1.A01]*.

5.1.1.4 BOBS continuously identify, analyse and document possible conflicts of interest arising from the provision of certification including any conflicts arising from its relationships.

5.1.1.5 The BOBS Certification Services Unit updates and maintain a Risk Assessment Matrix, *[BOBS.MSC.POL1.F01],* which shows the identified risks and demonstrates how threats to impartiality would be eliminated or minimised.

5.1.1.6 This Matrix is made available to the Certification Impartiality Committee (CIC).

5.1.2 Certification, Consultancy, Internal Audits, and Training

5.1.2.1 BOBS does not certify its wholly own subsidiary.

5.1.2.2 BOBS does not certify another certification body for its management system certification activities.

5.1.2.3 BOBS does not offer or provide consultancy services on management system standards.

UNCONTROLLED WHEN DOWNLOADED OR PRINTED

5.1.2.4 BOBS does not certify a management system on which a client has received management system consultancy or internal audits, where the relationship between the consultancy organization and BOBS poses an unacceptable threat to the impartiality.

5.1.2.5 BOBS does not outsource audits to a management system consultancy organization.

5.1.2.6 The BOBS training service is restricted to the provision of generic information and advice, which is freely available in the public domain.

5.1.3 Marketing of Certification and Consultancy

5.1.3.1 BOBS certification activities are not marketed or offered as linked with the activities of an organization that provides management systems consultancy. BOBS must instigate action to correct inappropriate claims by any consultancy organization stating or implying that certification would be simpler, easier, faster or less expensive if the certification body were used.

5.1.3.2 BOBS does not maintain a list of consultants for any management system standard.

5.1.3.3 BOBS ensures that none of its clients are given the impression that the use of specific consultancy service (and training) providers would bring business advantage to the client and make certification simpler, easier or less expensive.

5.1.3.4 Personnel (including those who may be subcontracted by BOBS) who have provided management system internal audits, including those acting in a managerial capacity, are not selected to take part in an audit or certification activities within two (2) years following the end of the internal audits.

5.1.4 Other Activities and Relationships

5.1.4.1 BOBS takes action to respond to any threats to its impartiality arising from the actions of other persons, bodies or organizations.

5.1.4.2 All BOBS certification personnel, either internal or external, or committees, who could influence the certification activities, are required to act impartially and not allow commercial, financial or other pressures to compromise impartiality.

5.1.4.3 BOBS requires personnel, internal and external, to reveal any situation known to them that may present them or BOBS with a conflict of interests, *[BOBS.MSC.POL1.F02]*.

5.1.4.4 All personnel upon appointment, including committee members, technical experts, subcontracted/external bodies or individuals acting on behalf of BOBS, are required to keep confidential all information obtained or created during the certification activity, [BOBS.MSC.POL1. F03]

5.1.4.5 All persons appointed to take certification activities in committee*s* are required to complete *[BOBS.MSC.POL1.F04]* where they reveal any situation known to them that may present them or BOBS with a conflict of interests.

5.1.4.6 BOBS uses this information as input to identify threats to impartiality raised by the activities of such personnel or by the organizations that employ them, and does not use such personnel, internal or external, unless BOBS can demonstrate that there is no conflict of interests.

5.1.5 Liability and Financing

5.1.5.1 BOBS demonstrates that it has evaluated the risks arising from its certification activities and that it has adequate arrangements such as insurance to cover liabilities arising from its operations.

5.1.5.2 BOBS evaluates its finances and sources of income and demonstrate to the Impartiality Committee that initially and on an ongoing basis, commercial, financial or other pressures do not compromise its impartiality.

5.1.6 Committee for Safeguarding Impartiality

5.1.6.1 BOBS has established the CIC to safeguard the impartiality of its certification services.

5.1.6.2 The composition, terms of reference, duties, authorities, competence of members and responsibilities of the CIC is formally documented and authorised by BOBS' top management.

5.2 Management of confidentiality

5.2.1 Obligations of BOBS

5.2.1.1 BOBS commits itself to confidentiality concerning all information available to it in the context of its activities on the client's premises, whether this information relates to internal matters of the client or to its business relations. This also applies to verbal or written results of the audit.

5.2.1.2 BOBS, through legally enforceable agreements, has a policy and arrangements to safeguard the confidentiality of the information obtained or created during the performance of certification activities at all levels of its structure, including committees and external bodies or individuals acting on its behalf.

5.2.1.3 BOBS informs the client, in advance, of the information it intents to place in the public domain. All but information that is publicly accessible by the client is considered confidential.

5.2.1.4 BOBS does not disclose the client's confidential information, trade secrets or processing procedures to any third party unless required to do so by Law.

5.2.1.5 Information about the client from sources other than the Client (e.g. complainants, regulators) is treated as confidential, consistent with *[BOBS.MSC.PROC11]*

5.2.1.6 All personnel, including committee members, technical experts, subcontracted/external bodies or individuals acting on behalf of BOBS, keep confidential all information obtained or created during the certification activity, *[BOBS.MSC.POL1.F03]*

5.2.1.7 All client information that has been deemed confidential is kept in a safe and secure, limited access facility.

5.2.1.8 BOBS allows access to both its own documents and client-related data to Accreditation Authorities as relevant for the assessment the BOBS management systems certification scheme.

5.2.1.9 BOBS maintains records for declaration of conflict of interests expressed for issues at hand.

6.0 Records

Records resulting from the implementation of this Policy are kept in designated files and controlled in accordance with procedure for control of records *[BOBS.MSC.PROC12].*

UNCONTROLLED WHEN DOWNLOADED OR PRINTED